

IN THE UNITED STATES BANKRUPTCY COURT

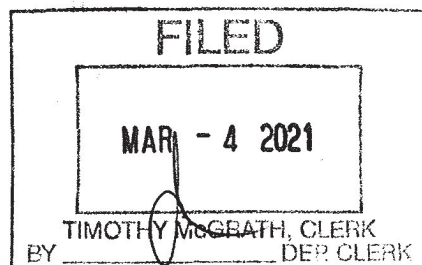
case no. 20-14864-PMM

in re: "CAROL A. HOUSER"

ANSWER OPPOSING TRUSTEE MOTION TO DISMISS

1. It is unclear on what grounds the Chap. 13 Trustee seeks dismissal, and motion is hereby made for a more definitive statement. As it stands, we are unable to form a responsive answer after failure to state any claim by the Trustee.
2. Moreover, the said motion fails to identify any basis for "unreasonable delay", or to even name the "creditor" who was prejudiced by any "delay", or what this "delay" entails. The Chap. 13 Plan is perfectly feasible, but the Interested Party or presumed Creditor has failed to enter their own "Proof of Claim" at this time.
3. Neither the Trustee or the Court has any inkling whether a plan is "feasible" without Proof of Claim established in the record. Our plan is simple redemption of the mortgage lien, and the imposition of a "constructive trust" to avoid unjust enrichment. First we must have a creditor, and their proof of claim.

date: 3/2/2021



Carol A. Houser

CAROL A. HOUSER

5355 Monocacy Drive
Bethlehem Pa. 18017

CERTIFICATE OF SERVICE

The foregoing Answer opposing the Chap. 13 Trustee motion for dismissal was mailed 1st class on 3/2/2021 to the following address:

Scott F. Waterman, Trustee
2901 St. Lawrence Ave.
Suite 100 Reading, Pa. 19606

and e-filed at the time of docketing.

date: 3/2/2021

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